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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRODERICK SINCLAIR, individually,

Plaintiff,

vs.

OTIS ELEVATOR COMPANY, ROBERT
LINDLEY, STEVE BURGER, ZACHARY
CHRISTIANSEN, STEVEN SPERB, KEVIN
HANSON, JANE NGUYEN, AND PAUL
HENTZ; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:22-cv-02065-GMN-EJY

**DEFENDANT STEVE BURGER'S
UNOPPOSED MOTION TO
EXTEND TIME TO ANSWER OR
OTHERWISE PLEAD**

(FIRST REQUEST)

Defendant Steve Burger ("Burger"), by and through his attorneys, and pursuant to LR IA 6-1, respectfully moves this Court to extend the deadline for him to answer or otherwise respond to Plaintiff's Amended Complaint until April 17, 2023. In support of this motion, Burger states as follows:

1. Plaintiff filed his Complaint in the District of Nevada on December 13, 2022, and his First Amended Complaint on March 1, 2023.
2. Burger was served on March 11, 2023, and his response is currently due on April 3, 2023.

1 3. Burger and his counsel require additional time in which to investigate the claims
2 and prepare his response to the Complaint.

3 4. Burger's counsel contacted opposing counsel on March 28, 2023 and March 30,
4 2023 to request an extension of time for Burger to answer or otherwise respond to the Complaint.
5 Plaintiff does not object to this extension.
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7 5. This is Burger's first request for an extension of time to answer or otherwise
8 respond to Plaintiff's complaint.

9 6. This request is made in good faith and not for the purposes of unwarranted delay
10 or for any other improper purpose.

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2 WHEREFORE, for the foregoing reasons, Burger respectfully requests that the Court enter
3 an order granting Burger an extension of time until April 17, 2023, in which to answer or otherwise
4 respond to Plaintiff's Complaint.

5 Dated: March 30, 2023

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7 Respectfully Submitted,

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9 /s/Doreen Spears Hartwell

10 Doreen Spears Hartwell
Hartwell Thalacker, LTD

11 *Attorneys for Defendant*
12 *STEVE BURGER*

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15 IT IS SO ORDERED.

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: March 31, 2023.
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